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Ellen M. Bender Esq.  
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(*pro hac vice pending*)  
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*Counsel to the Circuit City Stores, Inc.  
Liquidating Trust*

Lynn L. Tavenner, Esq. (VA Bar No. 30083)  
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TAVENNER & BERAN, PLC  
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*Counsel to the Circuit City Stores, Inc.  
Liquidating Trust*

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
RICHMOND DIVISION

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In re:	:	Chapter 11
	:	
CIRCUIT CITY STORES, INC., <u>et al.</u> ,	:	Case No. 08-35653 (KRH)
	:	
Debtors.	:	
-----	:	Jointly Administered
	x	

**MOTION FOR ADMISSION**  
**PRO HAC VICE OF ELLEN M. BENDER**

Lynn L. Tavenner and Paula S. Beran (“Movants”) hereby move the Court,  
pursuant to Local Bankruptcy Rule 2009-1(E), to enter an order authorizing Ellen M.  
Bender (“Ms. Bender”), an attorney with the law firm of Pachulski Stang Ziehl & Jones  
LLP, to appear pro hac vice in the referenced proceeding before the United States  
Bankruptcy Court for the Eastern District of Virginia (the “Bankruptcy Court”) to

represent the Circuit City Stores, Inc. Liquidating Trust, and in support of this Motion, the Movants state as follows:

1. Movants are members in good standing of the Bar of the Commonwealth of Virginia and an attorney admitted to practice before the United States Bankruptcy Court for the Eastern District of Virginia.

2. Ms. Bender is a member of good standing of the State Bar of California and is an attorney admitted to practice before the United States District Court for the Central, Northern, Southern and Eastern Districts of California and the United States Ninth Circuit Court of Appeals. There are no disciplinary proceedings pending against Ms. Bender in any jurisdiction in which she is admitted to practice.

3. Movant requests that this Court authorize Ms. Bender to file pleadings in, to appear and be heard at hearings concerning, and to otherwise participate in the Bankruptcy Case (and related proceedings) on behalf of the Circuit City Stores, Inc. Liquidating Trust.

4. Movant and her law firm shall serve as co-counsel with Ms. Bender in the Bankruptcy Case (and related proceedings).

5. Notice of this Motion has been given to (a) the Office of the United States Trustee, (b) counsel for the Debtor, and (c) all persons receiving electronic notice in the Bankruptcy Case as of the service hereof.

6. The Application to Qualify as a Foreign Attorney Under Local Bankruptcy Rules 2090-1(E) is attached hereto as Exhibit A.

WHEREFORE, Movant respectfully requests that this Court enter an Order authorizing Ellen M. Bender to appear pro hac vice in the Bankruptcy Case in substantially the same form as Exhibit B attached hereto and grant such other and further relief as just.

Dated: October 9, 2013

Respectfully submitted,

/s/ Paula S. Beran  
Movant

Lynn L. Tavenner (VA Bar No. 30083)  
Paula S. Beran (VA Bar No. 34679)  
TAVENNER & BERAN PLC  
20 North Eighth Street, 2nd Floor  
Richmond, Virginia 23219  
Telephone: 804-783-8300  
Facsimile: 804-783-0178

*Co-Counsel for the Circuit City Stores, Inc. Liquidating Trust*

**CERTIFICATION OF SERVICE**

I hereby certify that on the 9<sup>th</sup> day of October, 2013, a true and correct copy of the foregoing Motion for Admission Pro Hac Vice of Ellen M. Bender was served on all persons receiving electronic notice in these cases, including:

Assistant United States Trustee  
Robert B. Van Arsdale  
Office of the United States Trustee  
701 East Broad Street, Suite 4303  
Richmond, VA 23219

/s/ Paula S. Beran  
Movant

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF VIRGINIA  
RICHMOND DIVISION

APPLICATION TO QUALIFY AS A FOREIGN ATTORNEY UNDER  
LOCAL BANKRUPTCY RULE 2090-1(E)(2)

In Case No.: 08-35653 (KRH) ,\* Case Name CIRCUIT CITY STORES, INC., et al.

PERSONAL STATEMENT

FULL NAME (no initials, please) ELLEN M. BENDER  
Bar Identification Number 116987 State CA  
Firm Name PACHULSKI STANG ZIEHL & JONES LLP  
Firm Phone # 310-277-6910 Direct Dial# 310-772-2382 FAX # 310-201-0760  
E-Mail Address ebender@pszjlaw.com  
Office Mailing Address 10100 Santa Monica Blvd., 13th Floor, Los Angeles, CA 90067  
Name(s) of federal court(s) in which I have been admitted CA Northern, Southern, Eastern and Central District Courts

I certify that the rules of the federal court in the district in which I maintain my office extend a similar *pro hac vice* admission privilege to members of the bar of the Eastern District of Virginia.

I have not been reprimanded in any court nor has there been any action in any court pertaining to my conduct or fitness as a member of the bar.

I hereby certify that, within 90 days before the submission of this application, I have read the Local Rules of this Court and that my knowledge of the Federal Rules of Civil Procedure, the Federal Rules of Bankruptcy Procedure, and the Federal Rules of Evidence is current.

  
(Applicant's Signature)

I, the undersigned, do certify that I am a member of the bar of this Court, not related to the applicant; that I know the applicant personally, that the said applicant possesses all of the qualifications required for admission to the bar of this Court; that I have examined the applicant's personal statement. I affirm that his/her personal and professional character and standing are good, and petition the court to admit the applicant *pro hac vice*.

/s/ Paula S. Beran  
(Signature)

October 9, 2013  
(Date)

Paula S. Beran, Esquire  
(Typed or Printed Name)

\**Pro hac vice* admission in a case shall include an adversary proceeding(s) in the case.

Jeremy V. Richards Esq.  
Ellen M. Bender Esq.  
Shirley S. Cho Esq.  
(*pro hac vice pending*)  
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Debtors.	:	
-----	:	Jointly Administered
	x	

**ORDER GRANTING MOTION FOR ADMISSION  
PRO HAC VICE OF ELLEN M. BENDER**

The matter came before the Court upon the Motion for Admission Pro Hac Vice of Ellen M. Bender (the "Motion") filed by Lynn L. Tavenner and Paula S. Beran, seeking admission pro hac vice for Ellen M. Bender, of the law firm of Pachulski Stang Ziehl & Jones LLP, in the above-referenced bankruptcy case (the "Bankruptcy Case") pursuant to Local Bankruptcy Rule 2090-1(E). After review of the Motion and statements therein, the Court finds that adequate notice of the Motion has been provided, no other or further

notice is necessary or required, and it is appropriate that Ellen M. Bender be authorized to practice pro hac vice before the Court in this Bankruptcy Case, it is hereby

ORDERED as follows:

1. The Motion is hereby Granted.
2. Ellen M. Bender, of the law firm of Pachulski Stang Ziehl & Jones LLP is hereby admitted to appear in this Bankruptcy Case and ay related proceedings pro hac vice pursuant to Local Bankruptcy Rule 2090-1(E)(2) on behalf of the Circuit City Stores, Inc. Liquidating Trust.

Dated:

\_\_\_\_\_  
UNITED STATES BANKRUPTCY JUDGE

I ASK FOR THIS:

\_\_\_\_\_  
Lynn L. Tavenner (VA Bar No. 30083)  
Paula S. Beran (VA Bar No. 34679)  
TAVENNER & BERAN PLC  
20 North Eighth Street, 2nd Floor  
Richmond, Virginia 23219  
Telephone: 804-783-8300  
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*Co-Counsel for the Circuit City Stores, Inc. Liquidating Trust*

**RULE 9022-1 CERTIFICATION**

I HEREBY CERTIFY that the foregoing proposed order has been endorsed by all necessary parties.

\_\_\_\_\_  
*Co-Counsel for the Circuit City Stores, Inc.  
Liquidating Trust*